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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 ERIC YOKANI MORENO-OCHOA,

13 Defendant.
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Case No.: 2:18-cr-00116-JAD-CWH

**Joint Stipulation to Continue
Government's Response to
Defendant's Motion to Dismiss
(ECF No. 43) and Defendant's Reply**

(First Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
17 Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States
18 Attorney, counsel for the United States of America, and Andrew M. Leavitt, counsel for
19 Eric Yokani Moreno-Ochoa, that the government's response to defendant's motion to
20 dismiss (ECF No. 43) currently due on Friday, June 21, 2019, be vacated and continued to
21 July 5, 2019, with defendant's corresponding reply due on July 12, 2019.

22 This Stipulation is entered into for the following reasons:

23 1. Government counsel continues to need additional time to properly respond
24 to defendant's motion, to include researching the issues raised by the defendant.

2. Denial of this request for continuance could result in a miscarriage of justice.

3. This is the first request for continuance of the government response to defendant's motion to dismiss.

DATED this 21st day of June, 2019.

NICHOLAS A. TRUTANICH
United States Attorney

By /s/ Andrew M. Leavitt

ANDREW M. LEAVITT

By /s/ Jared L. Grimmer

JARED L. GRIMMER
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ERIC YOKANI MORENO-OCHOA,

7 Defendant.
8
9

Case No.: 2: 18-cr-00116-JAD-CWH

10 IT IS THEREFORE ORDERED that the government's response to defendant's
11 motion to dismiss (ECF No. 43) currently due on Friday, June 21, 2019, be vacated and
12 continued to July 5, 2019, with defendant's corresponding reply due on July 12, 2019.

13 DATED this 26 day of June, 2019.

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16 UNITED STATES MAGISTRATE JUDGE
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